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September 27, 2006

Via: Federal Express and Facsimile (202)219-3923

Office of General Counsel
Federal Election Commission
999 East Street, NW
Washington, DC 20463
Attn: Jeff Jordan, Esquire Supervisory Attorney
Complaints Examination and Legal Administration.

RE: MUR 5780

Dear Mr. Jordan:

I am enclosing the Response and Objections of Respondent Republican Federal Committee of Pennsylvania to Complaint, MUR 5780, which is being filed on behalf of our client, Republican Federal Committee of Pennsylvania. The Committee is one of the Respondents to the Complaint. I am sending this to you by both Federal Express as well as by facsimile.

I am also enclosing a second copy of our client's response to MUR 5780. Would you kindly date and stamp this copy of the Response and return it to me in the stamped, self-addressed envelope that is enclosed and provided for your convenience. Thank you very much.

Very truly yours,

LAWRENCE J. TABAS

cc: Patricia Poprik, Treasurer, Republican Federal Committee of Pennsylvania

Over a Century of Solutions

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FEDERAL
OFFICE OF
GENERAL
COUNSEL

2804190224

IN AND BEFORE THE
FEDERAL ELECTION COMMISSION

In re: :
Republican Federal Committee : MUR 5780
of Pennsylvania, et al. :

RESPONSE AND OBJECTIONS OF RESPONDENT REPUBLICAN FEDERAL
COMMITTEE OF PENNSYLVANIA TO
COMPLAINT

Republican Federal Committee of Pennsylvania, the federal committee of the Pennsylvania Republican State Committee (the "Respondent"), hereby files this Response and Objection(s) to the Complaint filed with the Federal Election Commission (the "Commission") in the above-referenced Matter Under Review # 5780 (the "MUR").¹

Respondent has committed no violation of the Federal Election Campaign Act of 1971, as amended ("the Act") and the Complaint, accordingly, should be dismissed.

The Complaint alleges the following violations, each of which is groundless, to wit:

1. **Allegation #1:** Failure of Santorum 2006 to print a disclaimer on an invitation to an event in the proper typeface inside a text box.

RESPONSE: The disclaimer contained on the front of the invitation clearly states that the event and the invitation were paid for by Santorum 2006. Santorum 2006 is a wholly separate and totally independent entity from Respondent. Allegation #1 is not an allegation of any wrongdoing on the part of the Respondent. Accordingly Allegation #1 should be dismissed with respect to Respondent.

2. **Allegation #2:** 1) Inclusion inside a text box on an invitation of additional disclaimer(s) required by federal law and not required to be contained inside the text box; and, 2) failure to include the allocation formula for distribution of joint fundraising proceeds.

RESPONSE: There is no prohibition in the Act or in the Commission's regulations, which precludes inclusion of other information inside the text box disclaimer

¹ The Treasurer of the Respondent is not named as a Respondent in the Complaint.

required by 11 C.F.R. §110.11(2) such that the inclusion inside the text box of additional information and disclaimers required by other provisions of federal law is not prohibited.

Further, the allegation that the invitation contains no allocation formula for distribution of joint fundraising proceeds is completely false. The exhibits attached to the Complaint and forwarded to Respondent by the Commission include the following document which was contained in the solicitation package sent to invitees and attached to the Complaint:

**Santorum Victory Committee
Joint Fundraising Notice and Contribution Guidelines**

A copy of that page from the Complaint is attached to this Response as Exhibit "A." The notice and guidelines set forth the allocation formula required by 11 C.F.R. §102.17(2).

Allegation #2 draws erroneous legal conclusions not supported by the facts in the record and is false on its face as evidenced by the attachments to the Complaint. Accordingly, Allegation #2 must be dismissed.

3. **Allegation #3:** Invitations to two events held at a similar location at similar times without establishing a joint fundraising committee.

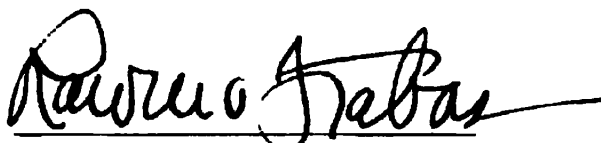
RESPONSE: The events at issue were two wholly separate events, one organized by Santorum 2006 and one organized by the Respondent, the Republican Federal Committee of Pennsylvania, held on the same day in close temporal proximity (often called a two-tiered event). As evidenced by the attached affidavit from Lisa Holman Stone, the controller for the Respondent, the Respondent's event was organized separately from the event that was organized to benefit Santorum 2006. There was *no* joint fundraising at either event. All logistics, costs, solicitations, location(s), arrangements, parking, amounts, and other facets of the events were managed and conducted separately. No funds were commingled and all receipts and costs related to the two separate events were received, tracked, recorded and processed separately by each separate beneficiary of each of the two separate events according to the legal guidelines for each.

Because no joint fundraising occurred before, during or after the two events held on the same day, no joint fundraising committee need have been formed for the respective events and no violation(s) of the Act were committed by any of the Respondent, individually or jointly. Allegation #3 draws erroneous legal conclusions not supported by the facts in the record. Accordingly, Allegation #3 must be dismissed.

CONCLUSION

For the reasons stated above and because neither the facts nor the law support further proceedings with respect to the Complaint, and because Respondent has committed no violation(s) of the Act, the Respondent respectfully moves the Commission to dismiss the MUR and for such other necessary relief as deemed appropriate by the Commission. Respondent reserves the right to supplement this Response and Objection as necessary.

Respectfully Submitted,


Lawrence J. Tabas, Esq.

Obermayer Rebmann Maxwell & Hippel LLP
One Penn Center, 19th Floor
1617 John F. Kennedy Boulevard
Philadelphia, PA 19103-1895
(215) 665-3158
(215) 665-3165 (facsimile)

Counsel for Republican Federal Committee
of Pennsylvania

Submitted via FedEx and facsimile delivery this 27th day of September, 2006

Office of General Counsel
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Attention Jeff Jordan, Esq., Supervisory Attorney
Complaints Examination and Legal Administration

Commonwealth of Pennsylvania)
County of Cumberland) ss:
)

AFFIDAVIT OF LISA HOLMAN STONE

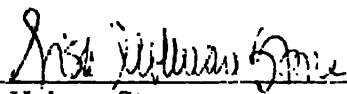
I, Lisa Holman Stone, do hereby affirm and state as follows:

1. I am an adult citizen of the Commonwealth of Pennsylvania and a resident of Cumberland County.
2. I am and have been at various times since 1992 the Comptroller of Republican State Committee of Pennsylvania.
3. I am responsible for various financial functions at Republican State Committee, including, *inter alia*, depositing into the correct accounts funds sent to Republican State Committee, including accounts maintained for the benefit of Republican State Committee's federal account the Republican Federal Committee of Pennsylvania.
4. The facts set forth in the foregoing Response of the Republican Federal Committee of Pennsylvania to the Complaint are true and correct to best of my knowledge, information and belief.
5. I can state unequivocally that the Santorum event of 2006 referenced in MUR #5780 organized by and for the benefit of Republican Federal Committee of Pennsylvania was a self-contained, separate event from another event organized for the same date in a similar (but not identical) location to benefit the Santorum 2006 ("Santorum 2006").
6. The invitations for the Santorum event were printed and paid for separately by Republican Federal Committee of Pennsylvania and were sent to a list separate from whatever list was used by Santorum 2006. The checks for the Santorum event were received and processed by the Republican Federal Committee and were not commingled with proceeds for any other entity including the Santorum 2006. Furthermore, the logistics and program for the events were separate, the costs were separately calculated and paid by each respective event beneficiary and there were no joint fundraising efforts involved in these two separate events.

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7. These were two separate events, not joint fundraising events in any manner whatsoever. The guest for each of the events was President Bush, but the events were managed and conducted separately from each other.

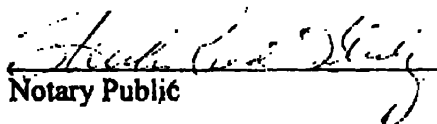
Further Affiant Sayeth Not.



Lisa Holman Stone

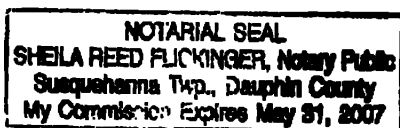
Before me appeared this 26 day of September, 2006, Lisa Holman and swore under penalty of perjury that the above and foregoing statements are true and correct to the best of her knowledge and belief.

S E A L



Notary Public

My Commission Expires:



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Santorium Victory Committee

Joint Fundraising Notice and Contribution Guidelines

The SANTORIUM VICTORY COMMITTEE is a joint fundraising committee to benefit SANTORIUM 2006 and the Republican Federal Committee of Pennsylvania - Victory 2006 ("VICTORY 2006").

Allocation Formula:

Contributions to the SANTORIUM VICTORY COMMITTEE will be allocated as follows:

1. The first \$2,100 from an individual to SANTORIUM 2006, designated for the general election;
2. The next \$10,000 from any individual to VICTORY 2006;
3. The first \$5,000 from any multi candidate PAC to SANTORIUM 2006 for the general election;
4. The next \$5,000 from any multi-candidate PAC to VICTORY 2006;
5. Contributions from non-qualified political committees shall be allocated in the same manner as contributions from individuals.

Instead of the allocation formula above, donor(s) may designate contributions in different amount(s) or to a specific Participant(s) and such earmarked contributions will be allocated to the Participant(s) in the amount(s) specified by the donor, provided no contribution may exceed the contribution limits under federal law. The allocation formula may change if any contributor makes a contribution that would exceed the amount he or she may lawfully give to any participant.

Additional Information

- Please park at the Villanova University Law School Parking lot, located just metres from Villanova. The entrance to the Parking lot is located on County Line Road.
- Coaches will transport guests from Villanova University starting at 8:00 a.m.
- Breakfast will be served beginning at 8:00 a.m.
- White House has recommended everyone arrive by 8:00 a.m. Roads will be closed as the First Lady arrives.
- No parking is permitted on the street, but private cars will be permitted to drop off and pick up guests. See directions to the lot on the other side.
- Photo Identification may be required. Be prepared to have all bags searched.
- Cameras will be permitted, but not in the photo line. Video Cameras are not permitted.
- Please call if you need handicapped assistance at

Directions to Event Parking at Villanova University:

Follow I-476 south to exit 13, St. David/Villanova (U.S. Route 30). Follow Route 30 east to the second traffic light at Route 320, Spring Mill Road (Villanova Diner and Royal Bank will be on the left). Make a left turn at the light and follow the road over small bridge to the first traffic light at County Line Road (you will pass the front of Villanova's Law School). Make a right at the light onto County Line Road and go to the second entrance on the right where you can enter the parking lot for the Law School.

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Please fill this out and return if you wish to allocate the contribution differently than listed on the other side:

☐ I/we wish to allocate our joint or my individual contribution as follows:

\$_____ (self) \$_____ (spouse) SANTORUM 2006 general election

\$_____ (self) \$_____ (spouse) VICTORY 2006

Signature of Contributor: _____

Spouse: _____

Contributions from corporations, foreign nationals lacking permanent resident status and federal contractors may not be accepted by the SANTORUM VICTORY COMMITTEE or either of the participating committees.

The maximum an individual may contribute to a federal candidate is \$2,100 to be allocated per election and \$10,000 per calendar year to a federal account of a state party committee. Couples may contribute \$24,200 if each spouse so designates the contributions. Qualified multi-candidate PACs may contribute \$10,000 to SANTORUM VICTORY COMMITTEE (\$5,000 to be allocated to SANTORUM 2006 general election and \$5,000 to be allocated to VICTORY 2006). Non-qualified PACs may contribute \$2,100 per election to a federal candidate and \$10,000 to a federal account of a state party committee.

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